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Attorneys for DORA BAIREs, individually, and
on behalf the estate of JUAN CARLOS
BAIREs; and Teofilo MIRANDA, an
individual.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DORA BAIREs, et al.,

Plaintiffs,

vs.

THE UNITED STATES OF AMERICA; et al.,

Defendants.

No.: C 09-05171 CRB

**STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING CASE
MANAGEMENT CONFERENCE**

Honorable Charles R. Breyer

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STIPULATION

Plaintiffs Dora Baires and Teofilo Miranda (“Plaintiffs”); Defendants United States of America, the Department of Homeland Security, United States Immigration and Customs Enforcement, the Division of Immigration Health Services, the Office of Detention and Removal, John P. Torres, James T. Hayes, Nancy Alcantar, Timothy Aitken, and Brian Myrick; and Defendants the County of Kern, Kern County Sheriff’s Department, Kern Medical Center, Lerdo Detention Facility, Donald Youngblood, and Khosrow Mostofi, M.D., (“Kern County Defendants”) (“Federal Defendants” and “Kern County Defendants” collectively herein “Defendants”), through their respective counsel of record, hereby agree and stipulate as follows:

1. Whereas, the Court scheduled the Case Management Conference for July 22, 2011, at 8:30 a.m.

2. Whereas, Plaintiffs intend to file the Third Amended Complaint on or before August 8, 2011, pursuant to the parties Amended Stipulation and Order re Third Amended Complaint.

3. Whereas, Defendants have agreed to respond to the Third Amended Complaint on or before September 8, 2011.

4. Whereas, in light of the unresolved state of the pleadings, and in the interest of judicial economy, the parties wish to continue the Case Management Conference to a date after the pleadings have been resolved and agree to set the Case Management Conference for Friday, October 21, 2011, at 8:30 a.m., or the Court’s first available date thereafter.

IT IS HEREBY STIPULATED AND AGREED, by and between the parties through their respective counsel of record, that:

The Case Management Conference currently scheduled for July 22, 2011, be continued to October 21, 2011, or the Court’s first available date thereafter.

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1 **IT IS SO STIPULATED.**

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3 DATED: July 13, 2011.

4 REED SMITH LLP

5 By /s/ Katie B. Annand
6 Katie B. Annand
7 Attorneys for Plaintiffs

8 DATED: July 13, 2011.

9 MELINDA HAAG

10 By /s/ Abraham A. Simmons
11 Abraham A. Simmons, Assistant United States
12 Attorney
13 Attorneys for Federal Defendants

14 DATED: July 13, 2011.

15 THERESA A GOLDNER, COUNTY COUNSEL

16 By /s/ Marshall S. Fontes
17 Marshall S. Fontes, Deputy County Counsel
18 Attorneys for Kern County Defendants
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~~PROPOSED~~ ORDER

The Court, having reviewed the parties' stipulation of July 13, 2011, regarding the Case Management Conference, orders as follows:

The Case Management Conference set for July 22, 2011, is continued to October 21, 2011 at 8:30 a.m.

IT IS SO ORDERED.

DATED July 14, 2011.

Honorable Charles R. Breyer
United States District Judge

